

AUSA

MAR 17 2008  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY [Signature] DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 82 35

UNITED STATES OF AMERICA,

Plaintiff,

v.

Tara Lynn MANUS (1)

Sienna Brittanie SALMO (2)

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about March 14, 2008, within the Southern District of California, defendant Tara Lynn MANUS and Sienna Brittanie SALMO did knowingly and intentionally import approximately 35.06 kilograms (77.132 pounds) of marijuana a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

[Signature]  
Special Agent Lance Swanson  
U.S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 17th,  
DAY OF March 2008.

[Signature]  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Tara Lynn MANUS (1)

4 Sienna Brittanie SALMO (2)

5 **PROBABLE CAUSE STATEMENT**

6 I, Special Agent Lance Swanson, declare under penalty of perjury, the following  
7 is true and correct:

8 On March 14, 2008 at approximately 0835 hours, Tara Lynn MANUS and Sienna  
9 Brittanie SALMO entered the United States at the Calexico, California, West Port of  
10 Entry. MANUS was the driver of a 1996 Dodge Truck, and SALMO was the sole  
11 passenger.

12 During the primary inspection Customs and Border Protection (CBP) Officer J.  
13 VanArsdall received a negative Customs Declaration from MANUS and SALMO and  
14 claimed U.S. citizenship. MANUS stated the vehicle belonged to her and that they had  
15 gone to Mexico to visit a friend who just had a baby. SALMO avoided eye contact and  
16 did not remove her sunglasses when answering questions. MANUS, SALMO and the  
17 vehicle were referred to secondary inspection.

18 In the vehicle secondary lot, CBP Officer Mendibles received a negative  
19 Customs Declaration from MANUS. MANUS stated the vehicle belonged to SALMO's  
20 boyfriend. MANUS stated they came to Mexico to visit a friend. CBP Officer  
21 Mendibles did a cursory search of the vehicle and found the spare tire felt solid. CBP  
22 Officer Mendibles requested CBP K-9 Officer C. Anzaldo to screen the vehicle with his  
23 Narcotics Detection Dog (NDD).

24 K-9 Officer C. Anzaldo received an alert from his NDD near the rear fender of the  
25 vehicle by the license plate.

26 Upon further inspection, CBP Officer Mendibles discovered one hundred and  
27 seven (107) packages in the spare tire, underneath the back seat, and in a specially  
28 built compartment in the bed of the truck. One of the packages was probed and a  
29

1 sample of a green leafy substance was obtained, which field tested positive for  
2 marijuana. The 107 packages had a combined net weight of approximately 35.06  
3 kilograms (77.132 pounds).

4 SALMO was placed under arrest and advised of her Constitutional Rights, which  
5 she acknowledged and waived, agreeing to answer questions. SALMO stated to  
6 Special Agent Swanson she was going to be paid \$1,400.00 to smuggle marijuana into  
7 the United States.

8 MANUS was placed under arrest and advised of her Constitutional Rights, which  
9 she acknowledged and waived, agreeing to answer questions. MANUS stated to  
10 Special Agent Swanson she was going to be paid \$1,400.00 to smuggle marijuana into  
11 the United States.

12  
13 Executed on 03/14/08 @ 1906 hrs

  
14 Lance Swanson  
15 SPECIAL AGENT

16  
17 One the basis of the facts presented in the probable cause statement consisting  
18 of 3 pages, I find probable cause to believe that the defendant named in this probable  
19 cause statement committed the offense on March 14, 2008 in violation of Title 21,  
20 United States Code, Sections 952 & 960.

21  
22   
23 United States Magistrate Judge

24  
25 3/14/08 8:30pm  
26 Date/Time  
27  
28  
29